

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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Sarah Aronson, M.D.,)
)
Plaintiff,)
)
vs.)
)
University Hospitals of)
Cleveland,)
)
Defendant.)

Case No. 1:10-CV-372
Christopher Boyko, J.

- - -

Deposition of Sarah Aronson, M.D., the
plaintiff herein, called on behalf of the defendants
for cross-examination, pursuant to the Federal Rules
of Civil Procedure, taken before Constance Versagi,
Court Reporter and Notary Public in and for the
State of Ohio, pursuant to notice, at the offices of
Ogletree Deakins, 4130 Key Tower, Cleveland, Ohio on
Monday, December 13, 2010, commencing at 9:12 a.m.

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1 have them.

2 A Those are the two that come to mind, that I
3 can remember the specific individuals
4 involved.

5 Q Did you consider that Dr. Johnson made his
6 assessments of you in other than good faith,
7 meaning he acted from some motive other than a
8 motive to comply with his responsibilities as
9 an assessor?

10 MR. GORDILLO: Could you read that
11 question back, please?

12 (Record read.)

13 A I would say the actual written evaluation he
14 provided, was provided in response to his
15 paperwork responsibilities as a faculty
16 member, fulfilling those responsibilities in
17 writing that evaluation. I don't feel that
18 the content that he wrote was an objective,
19 good faith evaluation of my abilities.

20 Q Was it based on some ancillary motive, a
21 personal animosity toward you, any type of
22 motive other than motive to fulfill his
23 responsibilities as best he believed them to
24 be, if you know?

25 MR. GORDILLO: Objection, form.

1 think there are too many women
2 anesthesiologists. It could be because they
3 think you had enough education already, why
4 are you in there now, whatever it might be,
5 that is what I'm after.

6 A I would say, that was I believe in some ways
7 the question that we started with, so the
8 names that I picked out of this list here
9 would be those individuals that I felt were
10 expressing views about me that were not --
11 that were influenced by feelings or opinions
12 or thoughts other than an objective assessment
13 of my abilities.

14 Q For Dr. Dumas, what kind of motives did you
15 believe that Dr. Dumas was acting under,
16 motive or motives, besides to fulfill her
17 responsibilities as an assessor?

18 A I would say regarding Dr. Dumas, I don't know
19 what her motivations were, but she appeared to
20 have negative feelings about me that were
21 separate from any dispassionate, clinical
22 assessment of my clinical abilities. Those
23 were expressed in the context of the
24 evaluations.

25 Q Correct. Thank you. For Dr. Hacker?

1 assessments prior -- strike that.

2 You are referring to inconsistencies
3 between assessments arising from his work with
4 you prior to October, versus the assessment he
5 made with you of your work in October of 2008?

6 A I would say there were inconsistencies between
7 evaluations provided prior to October. Then
8 subsequent to October, when we worked
9 together, in December, in which verbally he
10 had no concerns about my performance and his
11 documentation of what occurred in October.

12 Q Is that what you mean by inconsistencies?

13 A Yes.

14 Q Anything else on Dr. Norcia then?

15 A Not that I can think of at this moment.

16 Q Dr. Rubin.

17 MR. GORDILLO: Could we take a short
18 break?

19 MR. BIXENSTINE: Let's do that.

20 (Recess taken.)

21 Q We were going to turn to Dr. Rubin. I ask you
22 to tell me why you considered her assessments
23 of you were based on something other than
24 objective circumstances, assessment of
25 objective circumstances?

1 experienced physician, but he was new, as I
2 remember it. He was new at the time.

3 Q So he was competent to assess you as a
4 resident?

5 A Yes.

6 Q Nothing said, okay. Was there anything other
7 than what you described that bears on what his
8 motives might have been?

9 A Not that I can remember at this time.

10 Q Are there any other reasons why the program
11 should not have given full weight to his
12 assessments, beside what you provided me
13 already?

14 A Not that I can think of at this point.

15 Q You know, do you at this point have any better
16 sense of what you want to do with Dr. Wallace,
17 whether you want to put him on the list or
18 not?

19 A I would put him on the list of faculty who I
20 believe not acted in good faith.

21 Q In a general sense, I can understand that. I
22 have reason to -- documentation. In terms of
23 his -- we will get to again. In terms of his
24 assessments of you as an evaluator, that is
25 all I am focused on at this point.